

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

G.G., A.L., and B.S., individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

VALVE CORPORATION, a Washington  
corporation,

Defendant.

No. 2:16-cv-01941-JCC

**DEFENDANT VALVE  
CORPORATION'S MOTION TO  
SEAL**

**NOTE ON MOTION CALENDAR:  
MARCH 15, 2019**

Pursuant to Local Civil Rule 5(g) and the Stipulated Protective Order (Dkt. # 23), Valve Corporation moves to file under seal its Reply in Support of Valve Corporation's Motion to Lift Stay and Dismiss Case with Prejudice. Valve will contemporaneously file a redacted version of the Reply redacting the information sought to be sealed.

Plaintiffs' Motion to Seal (Dkt. # 34) sought leave to file under seal the Award of Arbitrator in AAA-01-18-0001-7979, *B.S. v. Valve Corp.* (Dkt. #35-1) and Award of Arbitrator in AAA-01-18-0001-7977, *G.G. v. Valve Corp.* (Dkt. #35-2). Valve's Reply quotes portions of those two Awards. Accordingly, Valve seeks to file an unredacted version of its Reply under seal, and to file a public version of its Reply that redacts the quoted portions of the two Awards. No alternatives are adequate because the information, descriptions of information, or

VALVE CORPORATION'S MOTION TO SEAL REPLY IN  
SUPPORT OF MOTION TO LIFT STAY AND DISMISS  
(No. 16-cv-01941-JCC) - 1

**FOX ROTHSCHILD LLP**  
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1 documents, are needed to adequately convey Valve's argument. As the parties previously  
2 conferred on sealing of these Awards (*see* Dkt. # 34 at p. 3), all meet and confer requirements are  
3 satisfied.

4 Because these Awards are the subject of a pending Motion to Seal (Dkt. # 34), Valve will  
5 make a showing of good cause to seal in its forthcoming response to that Motion and  
6 incorporates that showing into this Motion as if fully set forth herein.

7 DATED this 22nd day of February, 2019.

8 FOX ROTHSCHILD LLP

9  
10 By /s/ Gavin W. Skok  
11 Gavin W. Skok, WSBA #29766

12 And

13 MONTGOMERY MCCracken Walker &  
14 Rhoads, LLP

15 By /s/ Charles B. Casper  
16 Charles B. Casper (admitted *pro hac vice*)  
17 1735 Market Street  
18 Philadelphia, PA 19103  
19 (215) 772-1500

20 Attorneys for Defendant Valve Corporation  
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**CERTIFICATE OF SERVICE**

I certify that I am a secretary at the law firm of Fox Rothschild LLP in Seattle, Washington. I am a U.S. citizen over the age of eighteen years and not a party to the within cause. On the date shown below, I caused to be served a true and correct copy of the foregoing on counsel of record for all other parties to this action as indicated below:

<b><u>Service List</u></b>	
Kim D. Stephens, WSBA #11984 Jason T. Dennett, WSBA #30686 <b>TOUSLEY BRAIN STEPHENS PLLC</b> 1700 Seventh Avenue, Suite 2200 Seattle, WA 98101 Tel: (206) 682-5600 Fax: (206) 682-2992 <a href="mailto:KStephens@tousley.com">KStephens@tousley.com</a> <a href="mailto:jdennett@tousley.com">jdennett@tousley.com</a> <i>Attorneys for Plaintiffs</i>	<input type="checkbox"/> Via US Mail <input type="checkbox"/> Via Messenger <input checked="" type="checkbox"/> Via ECF/ Email <input type="checkbox"/> Via over-night delivery
Jasper D. Ward IV Alex C. Davis Patrick Walsh <b>JONES WARD PLC</b> Marion E. Taylor Building 312 S. Fourth Street, Sixth Floor Louisville, Kentucky 40202 Tel: (502) 882-6000 Fax: (502) 587-2007 <a href="mailto:jasper@jonesward.com">jasper@jonesward.com</a> <a href="mailto:alex@jonesward.com">alex@jonesward.com</a> <a href="mailto:patrick@jonesward.com">patrick@jonesward.com</a> <i>Attorneys for Plaintiffs</i>	<input type="checkbox"/> Via US Mail <input type="checkbox"/> Via Messenger <input checked="" type="checkbox"/> Via ECF / Email <input type="checkbox"/> Via over-night delivery

1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct.

3 EXECUTED this 22nd day of February, 2019, in Seattle, Washington.  
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6 Courtney R. Tracy  
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